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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIOQUINTO FERNANDEZ-CARRANZA,

Defendant.

CASE NO. 2:21-CR-00086-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: September 16, 2021
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant Pioquinto Fernandez-Carranza, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on September 16, 2021.
2. By this stipulation, the defendant now moves to continue the status conference until November 18, 2021, at 9:30 a.m., and to exclude time between September 16, 2021, and November 18, 2021, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery associated with this case which consists of over 400 pages of discovery, as well as audio files.
 - b) Counsel for the defendant desires additional time to consult with his client, review the current charges, conduct investigation and research related to the charges, review discovery, discuss potential resolutions with his client, and otherwise prepare for trial.

1 c) Counsel for the defendant believes that failure to grant the above-requested
2 continuance would deny him the reasonable time necessary for effective preparation, taking into
3 account the exercise of due diligence.

4 d) The government does not object to the continuance.

5 e) Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 et seq., within which trial must commence, the time period of September 16, 2021 to November
10 18, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
11 Code T4] because it results from a continuance granted by the Court at the defendant's request
12 on the basis of the Court's finding that the ends of justice served by taking such action outweigh
13 the best interest of the public and the defendant in a speedy trial.

14 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
15 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
16 must commence.

17
18 IT IS SO STIPULATED.

19
20 Dated: September 9, 2021

PHILLIP A. TALBERT
Acting United States Attorney

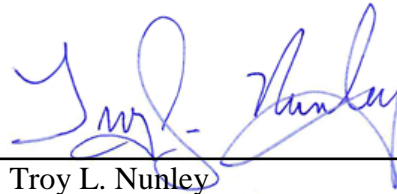
21
22 /s/ SAM STEFANKI
23 SAM STEFANKI
Assistant United States Attorney

24
25 Dated: September 9, 2021

/s/ HOOTAN BAIGMOHAMMADI
26 HOOTAN BAIGMOHAMMADI
27 Counsel for Defendant
PIOQUINTO FERNANDEZ-CARRANZA

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 9th day of September, 2021.



Troy L. Nunley
United States District Judge